

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

EDIE BROWN HITCHCOCK, et. al.,	)	CIVIL ACTION NO. 1:19-cv-2376
	)	
Plaintiffs,	)	JUDGE
	)	
vs.	)	
	)	
ALICE BROWN HITCHCOCK, et. al.,	)	<b>RULE 65(b) CERTIFICATION</b>
	)	
Defendants.	)	

---

Pursuant to Fed. R. Civ. P. 65(b)(1)(B), counsel for Plaintiffs Edie Brown Hitchcock, Barbara Ruth Pascoe, and Mary Esther Louise Hitchcock (“Plaintiffs”) hereby certifies that it has made the following efforts to provide notice to defendants in this case of Plaintiffs’ Application for Temporary Restraining Order and Preliminary Injunction and Other Emergency Relief (Dkt. 2) and the relief requested therein:

(1) On October 11, 2019, counsel for Plaintiffs advised General Counsel for Merrill Lynch, and the Ohio statutory agent for Merrill Lynch of the current litigation via email and regular mail and provided a copy of the Verified Complaint (Dkt. 1.) The correspondence further notified Defendant Merrill Lynch that Plaintiffs **are seeking relief in the form of a Temporary Restraining Order, Preliminary Injunction, and Other Emergency Relief**, and provided a copy of Plaintiffs’ Application for Temporary Restraining Order and Preliminary Injunction and Other Emergency Relief (i.e., Appointment of Interim Trustee) and Memorandum in Support of Plaintiffs’ Application for Temporary Restraining Order and Preliminary Injunction, along with the Proposed Temporary Restraining Order.

(2) On October 11, 2019, counsel for Plaintiffs informed Attorney Jonathan McPhee, counsel for Defendant Alice Hitchcock Brown, of the current litigation via email and regular mail and provided a copy of the Verified Complaint. The correspondence further notified Defendant Merrill Lynch that Plaintiffs **are seeking relief in the form of a Temporary Restraining Order, Preliminary Injunction, and Other Emergency Relief**, and provided a copy of Plaintiffs' Application for Temporary Restraining Order and Preliminary Injunction and Other Emergency Relief (i.e., Appointment of Interim Trustee) and Memorandum in Support of Plaintiffs' Application for Temporary Restraining Order and Preliminary Injunction, along with the Proposed Temporary Restraining Order.

Accordingly, Plaintiffs have provided notice of the Verified Complaint, Application for TRO and Preliminary Injunction and Other Emergency Relief, the Proposed Temporary Restraining Order, and supporting documentation to the Defendants in this litigation. Therefore, no further notice efforts should be required.

Respectfully submitted,

/s/ Steven S. Kaufman

Steven S. Kaufman (0016662)

[Steve.Kaufman@Kaufman-Company.com](mailto:Steve.Kaufman@Kaufman-Company.com)

Robin M. Wilson (0066604)

[Robin.Wilson@Kaufman-Company.com](mailto:Robin.Wilson@Kaufman-Company.com)

Chad D. Cooper (OH – 0074322)

[Chad.Cooper@Kaufman-Company.com](mailto:Chad.Cooper@Kaufman-Company.com)

Ashtyn N. Saltz (0089548)

[Ashtyn.Saltz@Kaufman-Company.com](mailto:Ashtyn.Saltz@Kaufman-Company.com)

KAUFMAN & COMPANY, LLC  
1001 Lakeside Avenue – Suite 1710  
Cleveland, Ohio 44114  
PH: 216.912.5500  
FX: 216.912.5501

*Attorneys for Plaintiffs*

*Edie Brown Hitchcock, Barbara Ruth Pascoe, and  
Mary Esther Louise Hitchcock*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 11, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. Copies of the foregoing were also served via email and regular mail upon the following:

Jonathan McPhee  
North Atlantic Legal, PLLC  
155 Fleet St.  
Portsmouth, NH 03801  
jmcpee@northatlanticlegal.com  
*Counsel for Alice Brown Hitchcock*

Merrill Lynch Wealth Management,  
a Division of Merrill Lynch, Pierce,  
Fenner & Smith, Inc.  
David G. Leitch, General Counsel  
Todd Stillerman, Assistant General Counsel  
214 North Tryon Street, NC1-027-20-05,  
Charlotte, North Carolina 28255  
david.leitch@bankofamerica.com  
william.stillerman@bankofamerica.com

and

c/o CT Corporation System  
4400 Easton Commons Way  
Suite 125  
Columbus, OH 43219

/s/ Steven S. Kaufman

*One of the Attorneys for Plaintiffs  
Edie Brown Hitchcock, Barbara Ruth  
Pascoe, and Mary Esther Louise Hitchcock*